

SJ-EXHIBIT 32

EXHIBIT 9: TOP 10 PHARMACIES, RANKED BY MME PER TRANSACTION (AT-ISSUE OPIOIDS)

96 Pharmacies (Lake and Trumbull)^[1]
January 1, 2008 - December 31, 2018

| Transactions Dispensed to Likely Residents of Lake and Trumbull ^[2] | | | | | | | | | | |
|--|----------|------------|------------|--------------------|-------------|--------------|---------------------|------------------------------------|------------------|--------------------|
| Rank | Pharmacy | Start Date | End Date | Total Transactions | Total MME | MME per Year | MME per Transaction | MME per Dosage Unit ^[3] | Type | Investigated |
| 1 | | 1/2/2008 | 12/20/2013 | 13,394 | 92,143,702 | 15,427,730 | 6,879 | 24 | Mail Order | Yes ^[4] |
| 2 | | 1/2/2008 | 5/14/2011 | 7,639 | 24,656,842 | 7,322,821 | 3,228 | 31 | Mail Order | Yes ^[5] |
| 3 | | 1/2/2008 | 1/15/2011 | 45,887 | 133,478,617 | 43,891,617 | 2,909 | 26 | Brick and Mortar | Yes ^[7] |
| 4 | | 5/16/2011 | 2/7/2014 | 6,593 | 17,043,319 | 6,227,038 | 2,585 | 27 | Mail Order | Yes ^[5] |
| 5 | | 11/22/2010 | 12/31/2018 | 48,311 | 117,153,103 | 14,436,490 | 2,425 | 24 | Brick and Mortar | |
| 6 | | 1/2/2008 | 12/31/2018 | 113,945 | 275,954,973 | 25,074,325 | 2,422 | 26 | Brick and Mortar | |
| 7 | | 1/17/2011 | 7/20/2015 | 36,959 | 83,728,211 | 18,566,705 | 2,265 | 21 | Brick and Mortar | |
| 8 | | 1/2/2008 | 12/31/2018 | 30,558 | 61,686,082 | 5,605,034 | 2,019 | 21 | Brick and Mortar | |
| 9 | | 12/16/2008 | 12/31/2018 | 25,667 | 51,398,252 | 5,114,602 | 2,003 | 22 | Brick and Mortar | |
| 10 | | 1/2/2008 | 12/9/2010 | 7,014 | 13,373,495 | 4,549,232 | 1,907 | 20 | Brick and Mortar | |
| 60 | | 1/1/2008 | 12/31/2018 | 68,107 | 52,177,059 | 4,739,827 | 766 | 11 | Giant Eagle | |
| 61 | | 1/1/2008 | 12/31/2018 | 66,445 | 49,931,550 | 4,535,843 | 751 | 11 | Giant Eagle | |
| 62 | | 1/1/2008 | 12/31/2018 | 38,009 | 28,471,039 | 2,586,344 | 749 | 10 | Giant Eagle | |
| 66 | | 1/1/2008 | 12/31/2018 | 51,931 | 38,496,329 | 3,497,053 | 741 | 11 | Giant Eagle | |
| 67 | | 1/1/2008 | 12/31/2018 | 83,545 | 61,752,497 | 5,609,672 | 739 | 10 | Giant Eagle | |
| 68 | | 1/1/2008 | 12/31/2018 | 68,954 | 50,707,330 | 4,606,315 | 735 | 11 | Giant Eagle | |
| 78 | | 1/1/2008 | 12/31/2018 | 43,964 | 28,603,976 | 2,598,420 | 651 | 9 | Giant Eagle | |
| 85 | | 1/2/2008 | 12/31/2018 | 32,840 | 17,402,729 | 1,581,279 | 530 | 9 | Giant Eagle | |
| 86 | | 1/1/2008 | 12/31/2018 | 28,852 | 15,225,795 | 1,383,130 | 528 | 9 | Giant Eagle | |
| 87 | | 1/2/2008 | 12/31/2018 | 54,270 | 26,729,852 | 2,428,777 | 493 | 9 | Giant Eagle | |

Notes:

- [1] All pharmacies located in Lake or Trumbull counties with 5,000 or more at-issue opioid transactions in OARRS dispensed to patients likely resident in Lake or Trumbull counties based on OARRS patient zip field, plus [redacted] and [redacted] (Ohio mail order pharmacies that dispensed 5,000 or more at-issue opioid transactions to likely residents of Lake and Trumbull counties).
- [2] At-issue opioid transactions in OARRS dispensed to patients likely resident in Lake or Trumbull counties based on OARRS patient zip field.
- [3] MME per dosage unit is calculated for oral solids only.
- [4] [redacted] was acquired by [redacted] in 2012. In 2016, federal investigators looked into [redacted] financial relationships with drug makers and prescription drug plan clients.
- [5] [redacted] and [redacted] are subsidiaries of [redacted]. [redacted] was investigated for Medicare and Medicaid fraud in 2012. In 2020, [redacted] agreed to pay the United States a \$15.3 million civil penalty to resolve allegations that it violated federal law by, among other things, allowing opioids and other controlled substances to be dispensed without a valid prescription at long-term care facilities.
- [6] [redacted] and [redacted] (dba [redacted]) were located at the same address. [redacted] likely started using the location after [redacted] was shut down.
- [7] In 2009, officials with Trumbull County’s chief narcotics unit, the Trumbull Ashtabula Group Law Enforcement Task Force, as well as the Ohio Board of Pharmacy conducted an investigation of [redacted] and owner [redacted]. They discovered that [redacted] wrote prescriptions in 2007 and 2008 for large amounts of pain medications and other dangerous drugs such as OxyContin, methadone, hydromorphone, methodose, Suboxone, and oxycodone, many of which were filled at [redacted].
- [8] [redacted] (dba [redacted]) and [redacted] appear to be the same pharmacy under different ownership during different time periods. Additionally, the pharmacy is part of the same chain as the [redacted]

Sources:

Ohio Board of Pharmacy’s Production of OARRS data; Plaintiffs' Ohio ARCOS dataset, "OH_processed.csv"; At-issue NDC list, "Pharmacy Defendants' NDC List.xlsx"; CDC MME dataset, "CDC_Oral_Morphine_Milligram_Equivalents_Sept_2018.xlsx"; [redacted] Answers To Interrogatories Nos. 1, 2, 3, 6, And 8 of Plaintiffs (First) Combined Track Three Interrogatories To Chain Pharmacy Defendants, July 13, 2020; National Address Database, U.S. Department of Transportation, October 29, 2020, available at <https://www.transportation.gov/gis/national-address-database/national-address-database-nad-disclaimer>; Google Geocoding API (via R ggmap package); [redacted], " available at [redacted] Agrees to Pay Over \$15 Million to Resolve Allegations It Improperly Dispensed Opioids at Long-Term Care Facilities," available a [redacted], " available [redacted]